

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

E.S., by and through her parents, R.S. and J.S., and
JODI STERNOFF, both on their own behalf, and on
behalf of all similarly situated individuals,

Plaintiffs,

v.

REGENCE BLUESHIELD; and CAMBIA
HEALTH SOLUTIONS, INC., f/k/a THE
REGENCE GROUP,

Defendants.

NO. 2:17-cv-1609-RAJ

STIPULATED MOTION AND
(PROPOSED)
ORDER FOR EXTENSION OF TIME
FOR PLAINTIFFS' MOTION FOR
CLASS CERTIFICATION

**Note on Motion Calendar:
May 23, 2025**

I. STIPULATION

The parties have engaged in an exchange of extensive informal discovery and an all-day mediation with Louis Peterson on April 3, 2025. Substantial progress was made during the mediation. At the conclusion of the mediation, the parties agreed to continue to negotiate over the terms of a long-form settlement agreement, but without any settlement amount. Under the agreement, when such an agreement is drafted, Mr. Peterson will make a "mediator's proposal" to each party with a proposed settlement amount.

The parties have reached agreement on the terms of long-form document, excluding the settlement amount. The parties have also investigated the costs related to notice for the settlement class and need additional time to investigate methods for reducing such costs, in order to

STIPULATED MOTION AND (PROPOSED)
ORDER FOR EXTENSION OF TIME FOR PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION – 1
(Case No. 2:17-cv-1609-RAJ)

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determine if a settlement is possible. Accordingly, the parties require additional time to resolve this dispute.

While these negotiations have continued, the parties have not pursued additional formal discovery. To date, no depositions have been taken by either party. Plaintiffs anticipate that they will require additional written discovery and at least a deposition of Regence's Rule 30(b)(6) witness before they can move for class certification. Similarly, Defendant anticipates that it may require the deposition(s) of the named plaintiffs before class certification. This discovery, aimed at class certification, may take 4-5 additional months, if no settlement is reached.

Accordingly, the parties respectfully request that the Court continue the current deadline for class certification of May 30, 2025 to October 31, 2025, so that the parties may conclude the ongoing settlement discussions.

DATED: May 23, 2025.

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II. [PROPOSED] ORDER

Pursuant to the foregoing stipulation between the parties, and for good cause shown, Plaintiffs shall file a Motion for Class Certification by October 31, 2025.

IT IS SO ORDERED.

DATED this _____ day of _____, 2025.

RICHARD A. JONES
United States District Judge

Presented by:

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